

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes
	)	

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Appellant's Rule 8006 Statement  
Of the Issues to Be Presented

Pursuant to Federal Rule of Bankruptcy Procedure 8006, Appellant, Greenhill & Co., LLC, by its counsel, Steinberg Shapiro & Clark, states the issues to be presented in this bankruptcy appeal are:

1. Whether the Bankruptcy Court erred when it determined that Greenhill & Co., LLC was a party within the scope of 11 U.S.C. § 943(b)(3).
2. Whether the Bankruptcy Court erred when it determined that 11 U.S.C. § 943(b)(3) authorizes the Court to do anything other than “review” the fees of a professional in a Chapter 9 proceeding and decline to confirm the plan of adjustment if the fees are not “reasonable”.
3. Whether the Bankruptcy Court erred when it ordered Greenhill & Co., LLC to participate in mediation to determine whether its fees were “reasonable” under 11 U.S.C. § 943(b)(3).
4. Assuming, arguendo, that the Bankruptcy Court has the authority to “review” the fees of Greenhill & Co., LLC, whether the Court erred in exercising that review when the fees would never become a direct obligation of the Debtor, and by the terms of the agreement reached between the Debtor and the Police and Fire Retirement Systems and the General Retirement

Systems Pension Funds, could not impact the City's obligations to the Pension Funds for at least nine (9) years after confirmation of the Debtor's Plan of Adjustment.

5. Whether the Bankruptcy Court has the jurisdiction/authority to affect the contractual rights of two non-debtor parties to a professional engagement agreement.

6. Whether the Bankruptcy Court had the jurisdiction/authority to subject the fees of Greenhill & Co., LLC to review under 11 U.S.C. § 943(b)(3) after confirming the Debtor's Plan of Adjustment, and approximately one (1) year and four (4) months after the commencement of the bankruptcy case.

STEINBERG SHAPIRO & CLARK

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